

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

JANE DOE,

Plaintiff,

v.

JAZWARES, LLC,

Defendant.

CASE NO. 0:23cv60966

NOTICE OF REMOVAL

Defendant, JAZWARES, LLC (“Jazwares”) and, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446(b), removes the Complaint filed by Plaintiff JANE DOE in the Seventeenth Judicial Circuit in and for Broward County, Florida entitled *Jane Doe v. Jazwares, LLC*, Case No. CACE-2023-002107 (the “State Court Action”) to this Court, as follows:

1.

On February 16, 2023, Plaintiff instituted the State Court Action against Jazwares, a diverse party, and, on April 17, 2023, filed an Amended Complaint.

2.

Because Plaintiff has not yet served Jazwares with process, this Notice of Removal is timely under 28 U.S.C. § 1446(b).

3.

This suit stems from Jazwares’ May 10, 2021, termination of Plaintiff, its former Vice President of Marketing, who earned an annual salary of \$210,000.00. *See* Declaration of Sandy

Solano, ¶ 4. On the face of her Amended Complaint, Plaintiff seeks, among other relief, back pay retroactive and reinstatement of employment.

4.

Federal courts, pursuant to 28 U.S.C. § 1332(a), have original jurisdiction over actions in which complete diversity exists between the parties and the amount in controversy exceeds \$75,000.00 exclusive of interest and costs.

5.

Jazwares, through this Notice of Removal, has shown by a preponderance of the evidence that this action is between citizens of different states. Plaintiff cannot dispute that she is a citizen of the State of Florida or that Jazwares is a citizen of the State of Arkansas.

6.

The fact that Plaintiff omits allegations of citizenship in the Amended Complaint does not preclude removal because

in practice, the federal courts usually do not limit their inquiry to the face of the plaintiff's complaint, but rather consider the facts disclosed on the record as a whole in determining the propriety of removal. 28 U.S.C. § 1446 makes it clear that this practice is correct. The provisions that a removal petition may be filed within thirty days of receipt of an "amended pleading, motion, order or other paper" from which it first appears that the case is removable demonstrates that a variety of papers may be considered in determining the removability of a case and it has been so held. Similarly there would be little point in requiring the petition for removal to contain a "short and plain statement" of the grounds for removal, if the federal court could not look to that statement to inform itself of the propriety of removal.

14A Wright Miller & Cooper, *Federal Practice and Procedure: Jurisdiction*, 2d, § 3734. See also *Woolard v. Heyer-Schulte*, 791 F. Supp. 294, 296 (S.D. Fla. 1992) (defendant's statutory right to removal not contingent upon plaintiff's "choice of words").

7.

Because Plaintiff, who earned \$210,000.00 annual while working for Jazwares, seeks back pay retroactive to May 10, 2021, Jazwares has shown that the amount in controversy exceeds \$75,000.00.

8.

Because the parties are diverse and the amount in controversy exceeds the sum of \$75,000.00 exclusive of interest and costs, this Court has diversity jurisdiction under 28 U.S.C. § 1332. As such, Jazwares's removal of the State Court Action is proper pursuant to 28 U.S.C. § 1441.

9.

Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings, and orders in the State Court Action are attached hereto as Exhibit 1.

10.

A copy of a Declaration of Sandy Solano (including Exhibit A, Plaintiff's payroll records), Jazware's Senior Director, Human Resources discussing Plaintiff's compensation is attached to this Notice of Removal as Exhibit 2.

11.

Under 28 U.S.C. § 1446(d), written notice of the filing of this Notice of Removal will be served on Plaintiff, the only adverse party, and a copy filed in the State Court Action. A copy of this Notice of Filing of Removal to be filed is attached as Exhibit 3.

WHEREFORE, Defendant Jazwares, LLC prays that the Seventeenth Judicial Circuit in and for Broward County, Florida proceed no further with the State Law Action; that the State Law Action be removed from the Circuit Court of Broward County, Florida to the United States District

Court for the Southern District of Florida, Fort Lauderdale Division; and that this Court issue such orders and process as are necessary to preserve its jurisdiction over this matter.

Dated: May 23, 2023.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was sent to the following
counsel for Plaintiff via electronic mail and the Court's portal:

Karen Coolman Amlong
kamlong@theamlongfirm.com
William R. Amlong
wramlong@theamlongfirm.com
The Amlong Firm
500 Northeast Fourth Street, Suite 101
Fort Lauderdale, Florida 33301-1154
Counsel for Plaintiff

Dated: May 23, 2023

By: /s/ Jonathan A. Beckerman
Jonathan A. Beckerman, Esq. (FBN 568252)
Jonathan.Beckerman@lewisbrisbois.com

Counsel for Defendant Jazwares, LLC

EXHIBIT 1

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

Case Number: _____

Jane Doe,

Plaintiff,

vs.

Jazwares, LLC,

Defendant.

_____/

COMPLAINT FOR DAMAGES AND OTHER RELIEF

Plaintiff, Jane Doe ("Ms. Doe" or "plaintiff") , sues defendant,
Jazwares, LLC ("Jazwares"), and says:

Introduction

1. This is an action brought under the Florida Civil Rights Act ("FCRA"), section 760.01, et seq., Florida Statutes by Jane Doe, a female, non-Jewish marketing executive who joined Jazwares, LLC, a toy manufacturing company first as a paid consultant in August 2019 and a month later was hired full-time as the vice president of marketing. Jazwares, a large toy manufacturing company, brags on its website, "We recognize the value in others and treat everyone with respect. Our strength lies in our people and talent." The company's founder and CEO, Judd Zebersky, built Jazwares,



The Amlong Firm • 500 Northeast Fourth Street • Fort Lauderdale, FL 33301 • 954.462.1983

which creates toys for such brands as Cabbage Patch Kids, Pokémon, Roblox, Cocomelon and others. Unfortunately, Mr. Zebersky was less successful in selecting executives to bring on board than he was at manufacturing toys and in the fall of 2020, Jazwares acquired a company, Wicked Cool Toys, and brought on board its two former-owner partners, Jeremy Padawer and Michael Rinzler, and a senior executive of their former company, Gerhard Runkin. These three men were dismissive and disrespectful of women, many of whom complained to Ms. Doe, who on March 25, 2021 passed on the women's complaints to Laura Zebersky, the wife of Judd Zebersky and President and Chief Commercial Officer of Jazwares. For Ms. Doe, the complaint to Ms. Zebersky was the beginning of the end: Ms. Doe began to be treated with extreme hostility and subjected to threats by Mr. Padawer and, although she seemed supportive at first, Ms. Zebersky later chastised her for bringing forth the complaints and inquiring on the status of the "investigation" and the following business day, May 10, 2021, abruptly terminated her.

Ms. Dean sues for race and religious discrimination because the company's top executives have a pattern of treating Jewish and non-Jewish employees and executives in an unequal manner and for gender discrimination and for retaliation. She seeks all available relief including compensatory and punitive damages, equitable relief and her attorney's fees and litigation expenses.

Jurisdiction, Venue, Parties

2. This court has jurisdiction because the amount in controversy exceeds \$30,000 exclusive of costs and interest and because Ms. Doe also seeks equitable relief, which the court has the power to grant.

3. Venue is proper in Broward County Court because the events and omissions giving rise to the claims occurred in Broward County, Florida.

4. Ms. Doe worked for Jazwares as a permanent employee from September 2019 until her termination May 10, 2021. She is protected by the Florida Civil Rights Act, Chapter 760, Florida Statutes ("FCRA"), because of:

- a. her sex (female) and
- b. her race/religion (non-Jewish).

5. Jazwares was at all material times an "employer" as envisioned by the FCRA, § 760.02(7), Fla. Stat.

Satisfaction of Conditions Precedent

6. Ms. Doe, on or about May 28, 2021, filed a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC"), which by operation of law was deemed dual filed with the Florida Commission on Human Relations ("FCHR") and sufficient to invoke her rights and remedies under the FCRA.

7. The EEOC, on February 16, issued a Dismissal and Notice of Rights to Ms. Dean "c/o The Amlong Firm, 500 Northeast Fourth Street Fort Lauderdale, FL 33301," which thereafter was received thereafter advising that the EEOC was terminating its processing of Ms. Doe's charge.

8. More than 180 days have elapsed since the filing of the Charge

of Discrimination without the FCHR's making a finding adverse to Ms. Stein or conciliating the matter, giving Ms. Stein the right to bring a civil action.

9. All conditions precedent to this action have been satisfied, waived or would be futile.

Applicable Statutes

10. The Florida Civil Rights Act ("FCRA") provides at § 760.10(1) that it is an unlawful employment practice for an employer:

(a) To discharge or to fail or refuse to hire any individual, or otherwise to discriminate against any individual with respect to compensation, terms, conditions, or privileges of employment, because of such individual's race. . . religion [or] sex

(b) To limit, segregate, or classify employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities, or adversely affect any individual's status as an employee, because of such individual's race. . . religion [or] sex

General Allegations

BACKGROUND

11. Jane Doe is a female, non-Jewish marketing executive who joined Jazwares, LLC, one of the world's largest toy manufacturers, in August 2019 as a paid consultant and in September 2019 as a full time employee and vice president of marketing.

12. Ms. Doe, and her largely female team, performed so well that she was promoted to senior vice president in January 2021 (and her second in command, Cymonda Wilson, also a non-Jewish woman, was promoted to vice president).

13. Laura Zebersky, the President and Chief Commercial Officer of Jazwares and wife of Judd Zebersky, the CEO, told me December 14, 2020 she saw Ms. Doe as evolving to Chief Marketing Officer. About the same time, Mr. Zebersky complimented Ms. Doe as having "totally transformed" the Jazwares marketing organization.

14. From the time between August 2019 when Ms. Doe arrived at Jazwares and December 2020 when Ms. Zebersky promoted her and thereafter, Ms. Doe built the entire marketing organization and practice from the ground up and led the marketing team to deliver and execute a marketing campaign strategy that enabled the company to massively increase revenues, including doubling on-line sales.

15. Ms. Zebersky recognized Ms. Doe's efforts in December 2020 by selecting her as one of two women from the company to attend a prestigious conference, the Alleghany Women's Leadership Summit, sponsored by Jazware's parent company.

THE "WICKED COOL TOY" GANG

16. Ms. Doe's rosy future quickly cratered, however, after she relayed to Ms. Zebersky on March 25, 2021, the numerous complaints she had been getting from women since around September 2020 concerning the dismissive, disrespectful and sexist behavior of three Jewish male executives

who joined Jazwares when the company acquired their Los Angeles-based former company, Wicked Cool Toys.

17. These three men, Jeremy Padawer and Michael Rinzler, both partner-owners and executive vice presidents of their former company, and Gerhard Runkin, a senior vice president (whom Ms. Doe learned Mr. Padawer had demanded be promoted when he learned that Ms. Doe was to be promoted, notwithstanding that Mr. Runkin had made mistakes that cost Jazwares more than \$300,000 during the year Ms. Doe had been reinventing the marketing division) called women "girls," missed scheduled meetings with women colleagues and executives, refused to respond to critical e-mails from women colleagues and executives and generally walled women out of any serious role in the management of Jazwares.

18. Ms. Doe never heard similar complaints from men she worked with or who worked with Messers. Padawer, Rinzler or Runkin.

19. The "Wicked Cool Toys" gang's misogynistic behavior was so serious and pervasive that one of Ms. Doe's marketing directors, Jaclyn Clark, whom she hired in September 2020 to work in Los Angeles, quit in January 2021 for reasons including that the men's behavior unreasonably interfered with her work performance.

20. Other examples of these men's misbehavior include:

a. At the February 2020 New York Toy Fair, a major industry event, Mr. Runkin, who was a vice president in the "Boys Brand" division, telling Ms. Doe (also a vice president at the time) at Jazware's

exhibition site he needed "you girls to keep watch of the [toy activation] so I can get to some meetings;"

b. Mr. Padawer demanding in March 2021 that two women marketing team members, Angelina Castro and Barbara Odette, be moved or fired for not giving credit on a social media post to an animator friend, and that they be removed from working on any other Boys Brand projects but took no disciplinary action against a male brand manager, Aaron Margolin, who leaked confidential information about new characters in a line of toys that the Boys Brand marketed and about which the owner of the line complained;

c. Messers. Padawer and Runkin refusing in March 2021 to nominate any woman from the Boys Brand division for the Women in Toys Wonder Woman awards—the only senior executives in the company to fail to nominate a single woman on their team, and

d. Mr. Runkin's not allowing Ms. Wilson, Ms. Doe's second-in-command, to participate in (or even observe) the content development for Jazwares's Squishville line of toys, which prevented Ms. Wilson from developing a proper marketing approach for the brand or preparing for its 2021 launch.

21. Other women also told Ms. Doe of their concerns, including:

a. Kelly Searfoss, who had reported to Mr. Padawer and Mr. Gerhard before Jazwares acquired Wicked Cool Toys and was transferred to Ms. Doe's team after the acquisition. Ms. Searfoss was pregnant and told us how relieved she was to be working for Ms. Doe's team because Messers.

Padawer and Gerhard thought pregnant women were lazy and unreliable (or words to that effect)

b. Elisa Vasquez, who in February and March 2021, complained to Ms. Doe and Ms. Wilson that male colleagues would not allow her to speak during meetings, would continually talk over her, and not allow her to provide important input into decision making.

22. Because of these and other complaints from female colleagues, on March 25, 2021, Ms. Doe approached her boss, Laura Zebersky, with a litany of complaints from women at Jazwares.

23. Ms. Doe, although anxious about what reaction to expect, was initially heartened by Ms. Zebersky's response, acknowledging that she had received other complaints about the "Los Angeles boys club" (a/k/a the "Wicked Cool Toys Gang"), that she was "not surprised" at the complaints relayed and saying she would "take it very seriously" and these men would "need to at least have some training, if not more serious actions."

24. Ms. Zebersky even mentioned as an example of the men's sexist behavior, a video Mr. Padawer and Mr. Rinzler participated in creating for the 2020 Global Sales Conference spoofing the television show, Three's Company: in the skit, Mr. Rinzler wore a blond wig and used balloons to caricature large female breasts. Upon seeing the video, Ms. Zebersky banned it.

THE INVESTIGATION

25. Four days after Ms. Doe made the complaint to Ms. Zebersky, Lori Keane, an associate general counsel, told Ms. Doe the company's

outside employment lawyer, Holly Goodman, would investigate and ask Ms. Doe for the names of the women who had complained.

26. Ms. Doe agreed to provide them, but later told Ms. Goodman that many women stated they feared retaliation by Mr. Padawer, Mr. Rinzler and Mr. Runkin if they spoke up.

27. They had, as Ms. Doe quickly learned, good reason to fear.

THE RETALIATION THAT FOLLOWED

28. Mr. Padawer on April 5, the first Monday after Ms. Doe made the complaint to Ms. Zebersky, began removing responsibilities from her marketing team and even more blatantly interfering with her team's operations and ability to do their work.

29. When Ms. Dean shared this information with Ms. Zebersky about how Mr. Padawer and Mr. Runkin's interference was harming the performance of the marketing team, Ms. Zebersky responded, "Jeremy's a partner and he can do/say whatever he wants."

30. On April 8, Ms. Zebersky relayed Mr. Padawer's "disappointment" with a newly hired marketing director's presentation at a recent sales conference, and then read an e-mail from someone on Mr. Runkin's team (sent to Ms. Zebersky) about negative feedback concerning marketing for the "Boy's Toys" product team, none of which ever had been shared with Ms. Doe previously.

31. Moreover, Mr. Runkin denied there was any negative feedback during an April 13 phone conference with Ms. Wilson and Ms. Doe and

shared only positive feedback with them about the marketing team. This left both women very confused.

MS. DOE TELLS HOLLY GOODMAN WHAT HAD BEEN GOING ON

32. Ms. Doe spoke with Ms. Goodman for more than an hour April 14 about the lack of respect for, or even response to, women on the marketing team by Mr. Padawer, Mr. Runkin, and others led by them on their "boys' team," as they often referred to it.

33. Ms. Doe also shared her knowledge of the men's purposeful exclusion of women from meetings and conversations critical to the ability of the marketing team to operate successfully. Ms. Doe told Ms. Goodman how the men regularly failed to show up for meetings and one-on-one appointments critical to keeping team communications intact.

34. Ms. Doe also told Ms. Goodman about her knowledge and e-mail evidence of rampant misuse of company resources by Mr. Padawer and Mr. Runkin, in which they would authorize spending against Ms. Doe's marketing department's tightly managed budget without their knowledge, causing the marketing department to exceed approved spending.

35. Ms. Goodman exuded apparent concern about what Ms. Doe was saying about gender bias, but neither followed up when told by Ms. Doe that she could give her specific examples nor requested any additional documentation about the things Ms. Doe discussed.

36. During an April 22 phone conferences amongst Messers. Padawer and Runkin, Ms. Wilson and Ms. Doe, and a call immediately

following between only Mr. Padawer and Ms. Doe, Mr. Padawer's tone grew even more hostile than usual and he began rambling about how:

- a. the marketing department differed from what he was used to;
- b. the marketing department was "breaking at the seams," although he had no examples of what this meant;
- c. there was "no CMO or senior marketing leader" (although Ms. Doe was the Senior Vice President of Marketing reporting directly to the President of Jazwares;
- d. he had no idea Ms. Wilson was head of the Integrated Marketing team, although he had many meetings and interactions with her for over a year;
- e. he solicited negative feedback about Ms. Dean and her team from certain agencies, with most of which Ms. Dean and her department rarely did business, but with all of which Mr. Padawer and Mr. Runkin had long-standing relationships and the quoted assessments of which contradicted the positive, objective, written feedback the marketing department regularly received from their day-to-day partners;
- f. that "the sole purpose of any department within Jazwares is to serve the brand team," i.e., "Boys' Toys," because "[t]he Brand Team is king;"
- g. that teams other than his needed to "know their place" and Ms. Doe needed to "get in line," and

h. this meeting "was not a discussion," "not a conversation," but a pronouncement it would be "[his] way or nothing" if Ms. Doe expected to have a place at Jazwares."

37. Ms. Doe was aghast at comments like these coming from someone other than Laura Zebersky, who was her direct supervisor.

MS. DOE REPORTS HER CONVERSATION TO MS. ZEBERSKY

38. When Ms. Doe reported this confusing, demeaning meeting to Ms. Zebersky the following morning, Ms. Zebersky cut her off and yelled at Ms. Doe, saying "You're a failure and you need to take responsibility for your failures;" "Stop being so dramatic, such a baby," and that Ms. Doe needed to produce a plan to reorganize marketing by Monday, which she did by Sunday, April 25, despite not knowing of what "failures" her boss was referring to.

39. Meetings with Ms. Zebersky took place on on April 26, April 27 and May 4.

40. During the meeting on April 26:

a. Ms. Zebersky and Ms. Keane told Ms. Doe that the "investigation," which had involved interviews with only five persons that Ms. Doe knew about, including Ms. Wilson and herself, had revealed "internal cultural issues" and "personality conflict," and was now being "brought in-house."

b. Ms. Zebersky told Ms. Doe there would be no "repercussive action" against the individuals mentioned in the investigation.

c. Ms. Zebersky then screamed about "all the drama that you have caused me" by making a complaint about this treatment, which had directly affected Ms. Doe's ability to do her job.

d. Ms. Zebersly told Ms. Doe how she was unprofessional and had failed; that she was the "source of all of the negativity" and she wanted "no more drama and no more people running to HR."

e. When Ms. Doe attempted to say something, Ms. Zebersky screamed, "You have no right to speak to me," which she followed when Ms. Doe attempted to look away by screaming, "Look at me when I'm talking to you."

f. Ms. Wilson had a similar meeting, but without the screaming.

g. Ms. Keane, the associate general counsel, sat in on both.

41. The April 27 started badly and ended, Ms. Doe mistakenly thought, "well."

a. First, Ms. Zebersky screamed about how Ms. Doe was a "failure" and "all about drama," that the investigation was coming in-house, and inquired whether I was going to "get on board ."

b. However, once Ms. Doe told her she wanted to speak with human resources, **One**, about the apparent lack of thoroughness of the investigation, since Ms. Doe had provided over 12 names, **Two**, how would the outcome of the investigation improved the working environment, **Three**, how the increased and escalating threats by Mr. Padawer, Mr. Runkin and her during the days and weeks following the complaint had caused Ms. Doe

and her team tremendous stress, fear for their jobs, confusion and inability to succeed, and **Four**, how Messers.' Padawer's and Runkin's efforts to get rid of her were the cause of what Ms. Zebersky called the "failures" in my department.

c. Upon hearing Ms. Doe's comments, Ms. Zebersky's disposition changed; she appeared to show concern and reversed herself: She told Ms. Doe affectionately, "I want my badass back," "There's a place for you," "Those guys are on notice" and she wanted a planning meeting with Ms. Wilson and Ms. Doe.

42. May 4 reverted back to Ms. Zebersky's her screaming mode; she appeared angry and made derogatory comments about items on the website. It seemed as if she were fabricating issues for which to fire Ms. Doe.

43. Ms. Doe took the next three days off to deal with stress-induced illnesses and severe gastrointestinal problems that required specialist care.

44. On May 7, Ms. Doe e-mailed Human Resources, asking how the investigation would continue "in house" and questioning what action would be taken about the "cultural issues."

45. On May 10, Ms. Doe had a tele-health call with her mental healthcare provider in the morning and planned to take the rest of May off because of her health. She had a meeting with Human Resources moved back to 4 p.m. because she wanted to talk to Human Resources about the investigation, about how she had been treated since the investigation had

begun, and about her wanting to take time off under the Family and Medical Leave Act.

46. When Ms. Doe got there, however, she was told that, **One**, the investigation was over; **Two**, Ms. Zebersky had issues with her performance and, **Three**, she I was fired.

47. Ms. Wilson, who is Black, while on a personal day to deal with her ongoing stress related to this same situation, was given the choice of resigning or being fired. The company cut off her work email told her she had resigned despite her agreeing to nothing. Later, after both Ms. Wilson and Ms. Doe were gone, Ms. Doe received a text message from Danielle Marder, VP of Business Development, stating she feared retaliation and that she would be next because she also spoke to M. Goodman.

48. As the result of the above, Ms. Doe has suffered damages.

THE AMLONG FIRM
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PHONE: 462-1983

By: /s/ Karen Coolman Amlong
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Florida Bar Number 275565
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WILLIAM R. aMLONG
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EXHIBIT

2

DECLARATION OF SANDY SOLANO

I, Sandy Solano under penalty of perjury pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of eighteen and am competent to testify to the matters stated in this Declaration.
2. I am currently employed as Senior Director, Human Resources for Jazwares, LLC (“Jazwares”). In this capacity, I have personal knowledge of the facts asserted in my Declaration, and of relevant business records of Jazwares, including but not limited to employee payroll records. Such business records, including Exhibit A to my Declaration, are records of acts, events, conditions, or opinions, made at, or near the time by, or from information transmitted by, a person with knowledge. At all relevant times, such documents were kept in the course of the regularly conducted business of Jazwares and it was the regular practice of Jazwares to make and keep such records.
3. Jazwares, a limited liability company organized and existing under the laws of the State of Delaware, is a citizen of Delaware.
4. Kelly Deen worked for Jazwares from September 16, 2019 to May 10, 2021. Immediately prior to her separation from employment, Kelly Deen was paid an annual base salary of \$210,000.
5. A true and correct copy of Kelly Deen’s payroll records are attached as **Exhibit A**.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

May 18, 2023

DATE

Sandy Solano

SANDY SOLANO

EXHIBIT

A

Check Date: 09/30/2019 / Direct Deposit / Checking / Account No: XXXXX8693 \$2,488.25

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	6,277.77	FED SOCSEC-ER	542.50
	0.00	8,750.00	FED SOCSEC	542.50		FED MEDCARE-ER	126.88
			FED	126.88		FED FUTA	42.00
			MEDCARE			FL SUI-ER	9.10
				2,472.23			720.48

Check Date: 09/30/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$6,277.77

Check Date: 10/15/2019 / Direct Deposit / Checking / Account No: XXXXX8693 \$2,488.24

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	6,277.78	FED SOCSEC-ER	542.50
	0.00	8,750.00	FED SOCSEC	542.50		FED MEDCARE-ER	126.88
			FED	126.87			669.38
			MEDCARE				
				2,472.22			

Check Date: 10/15/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$6,277.78

Check Date: 10/31/2019 / Direct Deposit / Checking / Account No: XXXXX8693 \$2,488.25

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	6,277.77	FED SOCSEC-ER	542.50
	0.00	8,750.00	FED SOCSEC	542.50		FED MEDCARE-ER	126.88
			FED	126.88			669.38
			MEDCARE				
				2,472.23			

Check Date: 10/31/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$6,277.77

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	7,997.89	FED SOCSEC-ER	542.50
			FED SOCSEC	542.50		FED MEDCARE-ER	126.88

Company: JAZWARES LLC

4 of 17

Date Printed: 12/01/2022 20:44

Check date: 11/15/2019 - Payroll 2

20145327 - RA/E8C

Pay Period: 11/01/2019 to: 11/15/2019

Payroll Details

Hours and Earnings				Taxes		Deductions		Employer		
Description	Hours	Rate	Amount	Tax	Amount	Deduction	Amount	Net Pay	Liability	Amount
Misc reimbursement non-taxable	0.00		1,720.11	FED	126.87					669.38
				MEDCARE						
	0.00		10,470.11		2,472.22					

Check Date: 11/15/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$7,997.89

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	6,506.66	FED SOCSEC-ER	542.50
			FED SOCSEC	542.50		FED MEDCARE-ER	126.88

Company: JAZWARES LLC

4 of 17

Date Printed: 12/01/2022 20:44

Check date: 11/29/2019 - Payroll 2

20145327 - RA/E8C

Pay Period: 11/16/2019 to: 11/30/2019

Payroll Details

Hours and Earnings				Taxes		Deductions		Employer		
Description	Hours	Rate	Amount	Tax	Amount	Deduction	Amount	Net Pay	Liability	Amount
Misc reimbursement non-taxable	0.00		228.89	FED	126.88					669.38
				MEDCARE						
	0.00		8,978.89		2,472.23					

Check Date: 11/29/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$6,506.66

Employee: **Deen, Kelly A** SSN: xxx-xx-9195

Regular	0.00	8,750.00	FED FIT	1,794.51	United Health	23.42	6,261.36	FED SOCSEC-ER	540.88
	0.00	8,750.00	FED SOCSEC	540.88	Care Medical Plan			FED MEDCARE-ER	128.50
			FED	128.49	United Health	2.22			667.38
			MEDCARE		Care Dental Plan				
				2,461.88	United Health	0.44			
					Care Vision Plan	0.88			
					Life Insurance				
						28.76			

Check Date: 12/13/2019 / Direct Deposit / Checking / Account No: XXXXXXXXX0223 \$8,261.36

Employee: **Deen, Kelly A** SSN: xxx-xx-9195

Bonus	0.00	20,000.00	FED FIT	5,727.23			12,742.77	FED SOCSEC-ER	1,240.00
	0.00	20,000.00	FED SOCSEC	1,240.00				FED MEDCARE-ER	290.00
			FED	290.00					1,530.00
			MEDCARE						
				7,267.23					

Check Date: 12/20/2019 / Direct Deposit / Checking / Account No: XXXXXXXXX0223 \$12,742.77

Employee: **Deen, Kelly A** SSN: xxx-xx-9195

Regular	0.00	8,750.00	FED FIT	1,677.67	United Health	351.26	6,031.53	FED SOCSEC-ER	518.25
	0.00	8,750.00	FED SOCSEC	518.25	Care Medical Plan			FED MEDCARE-ER	121.20
									639.45

Company: JAZWARES LLC

4 of 16

Date Printed: 12/01/2022 20:44

Check date: 12/31/2019 - Payroll 2

20145327 - RAVE8C

Pay Period: 12/16/2019 to: 12/31/2019

Payroll Details

Hours and Earnings				Taxes		Deductions		Net Pay	Employer	
Description	Hours	Rate	Amount	Tax	Amount	Deduction	Amount		Liability	Amount
				FED	121.20	United Health	33.32			
				MEDCARE		Care Dental Plan				
					2,317.12	United Health	6.62			
						Care Vision Plan				
						Life Insurance	10.15			
							401.35			

Check Date: 12/31/2019 / Direct Deposit / Checking / Account No: XXXXXXXXX0223 \$8,031.53

Check Date: 09/30/2019 / Direct Deposit / Checking / Account No: XXXXX8693 \$2,488.25

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	6,277.77	FED SOCSEC-ER	542.50
	0.00	8,750.00	FED SOCSEC	542.50		FED MEDCARE-ER	126.88
			FED	126.88		FED FUTA	42.00
			MEDCARE			FL SUI-ER	9.10
				2,472.23			720.48

Check Date: 09/30/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$6,277.77

Check Date: 10/15/2019 / Direct Deposit / Checking / Account No: XXXXX8693 \$2,488.24

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	6,277.78	FED SOCSEC-ER	542.50
	0.00	8,750.00	FED SOCSEC	542.50		FED MEDCARE-ER	126.88
			FED	126.87			669.38
			MEDCARE				
				2,472.22			

Check Date: 10/15/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$6,277.78

Check Date: 10/31/2019 / Direct Deposit / Checking / Account No: XXXXX8693 \$2,488.25

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	6,277.77	FED SOCSEC-ER	542.50
	0.00	8,750.00	FED SOCSEC	542.50		FED MEDCARE-ER	126.88
			FED	126.88			669.38
			MEDCARE				
				2,472.23			

Check Date: 10/31/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$6,277.77

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	7,997.89	FED SOCSEC-ER	542.50
			FED SOCSEC	542.50		FED MEDCARE-ER	126.88

Company: JAZWARES LLC

4 of 17

Date Printed: 12/01/2022 20:44

Check date: 11/15/2019 - Payroll 2

20145327 - RA/E8C

Pay Period: 11/01/2019 to: 11/15/2019

Payroll Details

Hours and Earnings				Taxes		Deductions		Employer		
Description	Hours	Rate	Amount	Tax	Amount	Deduction	Amount	Net Pay	Liability	Amount
Misc reimbursement non-taxable	0.00		1,720.11	FED MEDCARE	126.87					669.38
	0.00		10,470.11		2,472.22					

Check Date: 11/15/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$7,997.89

Employee: Deen, Kelly A**SSN: xxx-xx-9195**

Regular	0.00	8,750.00	FED FIT	1,802.85	6,506.66	FED SOCSEC-ER	542.50
			FED SOCSEC	542.50		FED MEDCARE-ER	126.88

Company: JAZWARES LLC

4 of 17

Date Printed: 12/01/2022 20:44

Check date: 11/29/2019 - Payroll 2

20145327 - RA/E8C

Pay Period: 11/16/2019 to: 11/30/2019

Payroll Details

Hours and Earnings				Taxes		Deductions		Employer		
Description	Hours	Rate	Amount	Tax	Amount	Deduction	Amount	Net Pay	Liability	Amount
Misc reimbursement non-taxable	0.00		228.89	FED MEDCARE	126.88					669.38
	0.00		8,978.89		2,472.23					

Check Date: 11/29/2019 / Direct Deposit / Checking / Account No: XXXXXXXX0223 \$6,506.66

Employee: Deen, Kelly A		SSN: xxx-xx-9195							
Regular	0.00	8,750.00	FED FIT	1,794.51	United Health	23.42	6,261.36	FED SOCSEC-ER	540.88
	0.00	8,750.00	FED SOCSEC	540.88	Care Medical Plan			FED MEDCARE-ER	128.50
			FED	128.49	United Health	2.22			667.38
			MEDCARE		Care Dental Plan				
				2,461.88	United Health	0.44			
					Care Vision Plan	0.88			
					Life Insurance				
						26.76			

Check Date: 12/13/2019 / Direct Deposit / Checking / Account No: XXXXXXXXX0223 \$8,261.36

Employee: Deen, Kelly A		SSN: xxx-xx-9195							
Bonus	0.00	20,000.00	FED FIT	5,727.23			12,742.77	FED SOCSEC-ER	1,240.00
	0.00	20,000.00	FED SOCSEC	1,240.00				FED MEDCARE-ER	290.00
			FED	290.00					1,530.00
			MEDCARE						
				7,267.23					

Check Date: 12/20/2019 / Direct Deposit / Checking / Account No: XXXXXXXXX0223 \$12,742.77

Employee: Deen, Kelly A		SSN: xxx-xx-9195							
Regular	0.00	8,750.00	FED FIT	1,677.67	United Health	351.26	6,031.53	FED SOCSEC-ER	518.25
	0.00	8,750.00	FED SOCSEC	518.25	Care Medical Plan			FED MEDCARE-ER	121.20
									639.45

Company: JAZWARES LLC

4 of 16

Date Printed: 12/01/2022 20:44

Check date: 12/31/2019 - Payroll 2

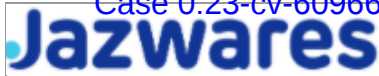
20145327 - RAVE8C

Pay Period: 12/16/2019 to: 12/31/2019

Payroll Details

Hours and Earnings				Taxes		Deductions		Employer	
Description	Hours	Rate	Amount	Tax	Amount	Deduction	Amount	Liability	Amount
				FED	121.20	United Health	33.32		
				MEDCARE		Care Dental Plan			
					2,317.12	United Health	6.62		
						Care Vision Plan			
						Life Insurance	10.15		
							401.35		

Check Date: 12/31/2019 / Direct Deposit / Checking / Account No: XXXXXXXXX0223 \$8,031.53



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 05/01/2021
Period End Date 05/15/2021
Pay Date 05/14/2021
Document 18916315
Net Pay \$4,138.75

Pay Details

KELLY A DEEN	Employee Number 100344	Pay Group Jazwares Salary	
	SSN XXX-XX-XXXX	Location Jazwares - FL, Sunrise	
	Job SVP, Marketing	Department MRKT - Marketing	
USA	Pay Rate \$120.1877		
	Pay Frequency Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	28.0020	\$3,365.50	\$86,698.86
Sick Pay	24.0000	\$2,884.50	\$2,884.50

Total Hours 52.0020

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$6,250.00	Yes	\$500.00	\$7,062.48	\$0.00	\$0.00
Dental	\$0.00	Yes	\$20.00	\$286.56	\$0.00	\$0.00
Medical	\$0.00	Yes	\$216.95	\$3,108.55	\$223.82	\$2,014.38
Sup Life Emp	\$100,000.00	No	\$6.09	\$87.29	\$0.00	\$0.00
Vision	\$0.00	Yes	\$3.97	\$56.93	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$250.00	\$3,583.36
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$11.25

Taxes

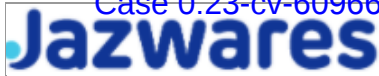
Tax	Based On	Current	YTD
Federal Income Tax	\$5,509.08	\$904.55	\$16,255.32
Employee Medicare	\$6,009.08	\$87.13	\$1,248.90
Social Security Employee Tax	\$6,009.08	\$372.56	\$5,340.14

Paid Time Off

Plan	Taken	Current	Balance	Net Pay Distribution		
Floating Hol	0.0000	0.0000	8.0000	Account Number	Account Type	Amount
Personal Time	0.0000	0.0000	24.0000	xxxxxxxx0223	Checking	\$4,138.75
Sick pay	24.0000	4.0000	76.0000	Total		\$4,138.75
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$6,250.00	\$5,509.08	\$1,364.24	\$747.01	\$4,138.75
YTD	\$89,583.36	\$79,068.84	\$22,844.36	\$10,601.81	\$56,137.19



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 04/16/2021
Period End Date 04/30/2021
Pay Date 04/30/2021
Document 17540241
Net Pay \$6,490.95

Pay Details

KELLY A DEEN	Employee Number 100344	Pay Group Jazwares Salary	
	SSN XXX-XX-XXXX	Location Jazwares - FL, Sunrise	
	Job SVP, Marketing	Department MRKT - Marketing	
USA	Pay Rate \$120.1877		
	Pay Frequency Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	86.6700	\$10,416.67	\$83,333.36

Total Hours 86.6700

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$10,416.67	Yes	\$833.33	\$6,562.48	\$0.00	\$0.00
Dental	\$0.00	Yes	\$33.32	\$266.56	\$0.00	\$0.00
Medical	\$0.00	Yes	\$361.45	\$2,891.60	\$223.82	\$1,790.56
Sup Life Emp	\$100,000.00	No	\$10.15	\$81.20	\$0.00	\$0.00
Vision	\$0.00	Yes	\$6.62	\$52.96	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$416.67	\$3,333.36
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$10.00

Taxes

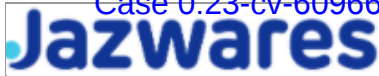
Tax	Based On	Current	YTD
Federal Income Tax	\$9,181.95	\$1,914.68	\$15,350.77
Employee Medicare	\$10,015.28	\$145.22	\$1,161.77
Social Security Employee Tax	\$10,015.28	\$620.95	\$4,967.58

Paid Time Off

Plan	Taken	Current	Balance	Net Pay Distribution		
Floating Hol	0.0000	0.0000	8.0000	Account Number	Account Type	Amount
Personal Time	0.0000	0.0000	24.0000	xxxxxxxx0223	Checking	\$6,490.95
Sick pay	0.0000	4.0000	96.0000	Total		\$6,490.95
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$10,416.67	\$9,181.95	\$2,680.85	\$1,244.87	\$6,490.95
YTD	\$83,333.36	\$73,559.76	\$21,480.12	\$9,854.80	\$51,998.44



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 04/01/2021
Period End Date 04/15/2021
Pay Date 04/15/2021
Document 17182279
Net Pay \$6,490.95

Pay Details

KELLY A DEEN	Employee Number 100344	Pay Group Jazwares Salary	
	SSN XXX-XX-XXXX	Location Jazwares - FL, Sunrise	
	Job SVP, Marketing	Department MRKT - Marketing	
USA	Pay Rate \$120.1877		
	Pay Frequency Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	86.6700	\$10,416.67	\$72,916.69

Total Hours 86.6700

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$10,416.67	Yes	\$833.33	\$5,729.15	\$0.00	\$0.00
Dental	\$0.00	Yes	\$33.32	\$233.24	\$0.00	\$0.00
Medical	\$0.00	Yes	\$361.45	\$2,530.15	\$223.82	\$1,566.74
Sup Life Emp	\$100,000.00	No	\$10.15	\$71.05	\$0.00	\$0.00
Vision	\$0.00	Yes	\$6.62	\$46.34	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$416.67	\$2,916.69
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$8.75

Taxes

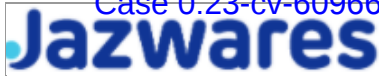
Tax	Based On	Current	YTD
Federal Income Tax	\$9,181.95	\$1,914.68	\$13,436.09
Employee Medicare	\$10,015.28	\$145.22	\$1,016.55
Social Security Employee Tax	\$10,015.28	\$620.95	\$4,346.63

Paid Time Off

Plan	Taken	Current	Balance	Account Number	Account Type	Amount
Floating Hol	0.0000	0.0000	8.0000	xxxxxxxx0223	Checking	\$6,490.95
Personal Time	0.0000	0.0000	24.0000	Total		\$6,490.95
Sick pay	0.0000	4.0000	92.0000			
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$10,416.67	\$9,181.95	\$2,680.85	\$1,244.87	\$6,490.95
YTD	\$72,916.69	\$64,377.81	\$18,799.27	\$8,609.93	\$45,507.49



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 03/16/2021
Period End Date 03/31/2021
Pay Date 03/31/2021
Document 16235304
Net Pay \$6,490.96

Pay Details

KELLY A DEEN	Employee Number 100344	Pay Group Jazwares Salary	
	SSN XXX-XX-XXXX	Location Jazwares - FL, Sunrise	
	Job SVP, Marketing	Department MRKT - Marketing	
USA	Pay Rate \$120.1877		
	Pay Frequency Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	86.6700	\$10,416.67	\$62,500.02

Total Hours 86.6700

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$10,416.67	Yes	\$833.33	\$4,895.82	\$0.00	\$0.00
Dental	\$0.00	Yes	\$33.32	\$199.92	\$0.00	\$0.00
Medical	\$0.00	Yes	\$361.45	\$2,168.70	\$223.82	\$1,342.92
Sup Life Emp	\$100,000.00	No	\$10.15	\$60.90	\$0.00	\$0.00
Vision	\$0.00	Yes	\$6.62	\$39.72	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$416.67	\$2,500.02
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$7.50

Taxes

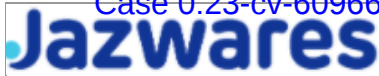
Tax	Based On	Current	YTD
Federal Income Tax	\$9,181.95	\$1,914.68	\$11,521.41
Employee Medicare	\$10,015.28	\$145.22	\$871.33
Social Security Employee Tax	\$10,015.28	\$620.94	\$3,725.68

Paid Time Off

Plan	Taken	Current	Balance	Account Number	Account Type	Amount
Floating Hol	0.0000	0.0000	8.0000	xxxxxxxx0223	Checking	\$6,490.96
Personal Time	0.0000	0.0000	24.0000	Total		\$6,490.96
Sick pay	0.0000	4.0000	88.0000			
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$10,416.67	\$9,181.95	\$2,680.84	\$1,244.87	\$6,490.96
YTD	\$62,500.02	\$55,195.86	\$16,118.42	\$7,365.06	\$39,016.54



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 03/01/2021
Period End Date 03/15/2021
Pay Date 03/15/2021
Document 15837839
Net Pay \$6,490.95

Pay Details

KELLY A DEEN [REDACTED] [REDACTED] USA	Employee Number	100344	Pay Group	Jazwares Salary
	SSN	XXX-XX-XXXX	Location	Jazwares - FL, Sunrise
	Job	SVP, Marketing	Department	MRKT - Marketing
	Pay Rate	\$120.1877		
	Pay Frequency	Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	86.6700	\$10,416.67	\$52,083.35

Total Hours 86.6700

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$10,416.67	Yes	\$833.33	\$4,062.49	\$0.00	\$0.00
Dental	\$0.00	Yes	\$33.32	\$166.60	\$0.00	\$0.00
Medical	\$0.00	Yes	\$361.45	\$1,807.25	\$223.82	\$1,119.10
Sup Life Emp	\$100,000.00	No	\$10.15	\$50.75	\$0.00	\$0.00
Vision	\$0.00	Yes	\$6.62	\$33.10	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$416.67	\$2,083.35
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$6.25

Taxes

Tax	Based On	Current	YTD
Federal Income Tax	\$9,181.95	\$1,914.68	\$9,606.73
Employee Medicare	\$10,015.28	\$145.22	\$726.11
Social Security Employee Tax	\$10,015.28	\$620.95	\$3,104.74

Paid Time Off

Plan	Taken	Current	Balance	Net Pay Distribution		
Floating Hol	0.0000	0.0000	8.0000	Account Number	Account Type	Amount
Personal Time	0.0000	0.0000	24.0000	xxxxxxxx0223	Checking	\$6,490.95
Sick pay	0.0000	4.0000	84.0000	Total		\$6,490.95
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$10,416.67	\$9,181.95	\$2,680.85	\$1,244.87	\$6,490.95
YTD	\$52,083.35	\$46,013.91	\$13,437.58	\$6,120.19	\$32,525.58



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 02/16/2021
Period End Date 02/28/2021
Pay Date 02/26/2021
Document 15837368
Net Pay \$6,490.94

Pay Details

KELLY A DEEN	Employee Number 100344	Pay Group Jazwares Salary	
	SSN XXX-XX-XXXX	Location Jazwares - FL, Sunrise	
	Job SVP, Marketing	Department MRKT - Marketing	
USA	Pay Rate \$120.1877		
	Pay Frequency Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	86.6700	\$10,416.67	\$41,666.68

Total Hours 86.6700

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$10,416.67	Yes	\$833.33	\$3,229.16	\$0.00	\$0.00
Dental	\$0.00	Yes	\$33.32	\$133.28	\$0.00	\$0.00
Medical	\$0.00	Yes	\$361.45	\$1,445.80	\$223.82	\$895.28
Sup Life Emp	\$100,000.00	No	\$10.15	\$40.60	\$0.00	\$0.00
Vision	\$0.00	Yes	\$6.62	\$26.48	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$416.67	\$1,666.68
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$5.00

Taxes

Tax	Based On	Current	YTD
Federal Income Tax	\$9,181.95	\$1,914.68	\$7,692.05
Employee Medicare	\$10,015.28	\$145.23	\$580.89
Social Security Employee Tax	\$10,015.28	\$620.95	\$2,483.79

Paid Time Off

Plan	Taken	Current	Balance	Net Pay Distribution		
Floating Hol	0.0000	0.0000	8.0000	Account Number	Account Type	Amount
Personal Time	0.0000	0.0000	24.0000	xxxxxxxx0223	Checking	\$6,490.94
Sick pay	0.0000	4.0000	80.0000	Total		\$6,490.94
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$10,416.67	\$9,181.95	\$2,680.86	\$1,244.87	\$6,490.94
YTD	\$41,666.68	\$36,831.96	\$10,756.73	\$4,875.32	\$26,034.63



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 02/01/2021
Period End Date 02/15/2021
Pay Date 02/12/2021
Document 15836981
Net Pay \$6,490.95

Pay Details

KELLY A DEEN	Employee Number 100344	Pay Group Jazwares Salary	
	SSN XXX-XX-XXXX	Location Jazwares - FL, Sunrise	
	Job SVP, Marketing	Department MRKT - Marketing	
USA	Pay Rate \$120.1877		
	Pay Frequency Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	86.6700	\$10,416.67	\$31,250.01

Total Hours 86.6700

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$10,416.67	Yes	\$833.33	\$2,395.83	\$0.00	\$0.00
Dental	\$0.00	Yes	\$33.32	\$99.96	\$0.00	\$0.00
Medical	\$0.00	Yes	\$361.45	\$1,084.35	\$223.82	\$671.46
Sup Life Emp	\$100,000.00	No	\$10.15	\$30.45	\$0.00	\$0.00
Vision	\$0.00	Yes	\$6.62	\$19.86	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$416.67	\$1,250.01
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$3.75

Taxes

Tax	Based On	Current	YTD
Federal Income Tax	\$9,181.95	\$1,914.68	\$5,777.37
Employee Medicare	\$10,015.28	\$145.22	\$435.66
Social Security Employee Tax	\$10,015.28	\$620.95	\$1,862.84

Paid Time Off

Plan	Taken	Current	Balance	Net Pay Distribution		
Floating Hol	0.0000	0.0000	8.0000	Account Number	Account Type	Amount
Personal Time	0.0000	0.0000	24.0000	xxxxxxxx0223	Checking	\$6,490.95
Sick pay	0.0000	4.0000	76.0000	Total		\$6,490.95
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$10,416.67	\$9,181.95	\$2,680.85	\$1,244.87	\$6,490.95
YTD	\$31,250.01	\$27,650.01	\$8,075.87	\$3,630.45	\$19,543.69



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 01/16/2021
Period End Date 01/31/2021
Pay Date 01/29/2021
Document 15836590
Net Pay \$6,490.96

Pay Details

KELLY A DEEN	Employee Number 100344	Pay Group Jazwares Salary	
	SSN XXX-XX-XXXX	Location Jazwares - FL, Sunrise	
	Job SVP, Marketing	Department MRKT - Marketing	
USA	Pay Rate \$120.1877		
	Pay Frequency Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	86.6700	\$10,416.67	\$20,833.34

Total Hours 86.6700

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$10,416.67	Yes	\$833.33	\$1,562.50	\$0.00	\$0.00
Dental	\$0.00	Yes	\$33.32	\$66.64	\$0.00	\$0.00
Medical	\$0.00	Yes	\$361.45	\$722.90	\$223.82	\$447.64
Sup Life Emp	\$100,000.00	No	\$10.15	\$20.30	\$0.00	\$0.00
Vision	\$0.00	Yes	\$6.62	\$13.24	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$416.67	\$833.34
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$2.50

Taxes

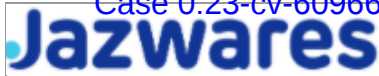
Tax	Based On	Current	YTD
Federal Income Tax	\$9,181.95	\$1,914.68	\$3,862.69
Employee Medicare	\$10,015.28	\$145.22	\$290.44
Social Security Employee Tax	\$10,015.28	\$620.94	\$1,241.89

Paid Time Off

Plan	Taken	Current	Balance	Net Pay Distribution		
Floating Hol	0.0000	0.0000	8.0000	Account Number	Account Type	Amount
Personal Time	0.0000	0.0000	24.0000	xxxxxxxx0223	Checking	\$6,490.96
Sick pay	0.0000	4.0000	72.0000	Total		\$6,490.96
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$10,416.67	\$9,181.95	\$2,680.84	\$1,244.87	\$6,490.96
YTD	\$20,833.34	\$18,468.06	\$5,395.02	\$2,385.58	\$13,052.74



Jazwares, LLC
963 Shotgun Road
Sunrise, FL 33326
954-790-6620

Pay Statement

Period Start Date 01/01/2021
Period End Date 01/15/2021
Pay Date 01/15/2021
Document 15836147
Net Pay \$6,561.78

Pay Details

KELLY A DEEN	Employee Number 100344	Pay Group Jazwares Salary	
	SSN XXX-XX-XXXX	Location Jazwares - FL, Sunrise	
	Job SVP, Marketing	Department MRKT - Marketing	
USA	Pay Rate \$120.1877		
	Pay Frequency Semi-Monthly		

Earnings

Pay Type	Hours	Current	YTD
Regular Pay	86.6700	\$10,416.67	\$10,416.67

Total Hours 86.6700

Deductions

Deduction	Based On	Pre-Tax	Employee		Employer	
			Current	YTD	Current	YTD
401K %	\$10,416.67	Yes	\$729.17	\$729.17	\$0.00	\$0.00
Dental	\$0.00	Yes	\$33.32	\$33.32	\$0.00	\$0.00
Medical	\$0.00	Yes	\$361.45	\$361.45	\$223.82	\$223.82
Sup Life Emp	\$100,000.00	No	\$10.15	\$10.15	\$0.00	\$0.00
Vision	\$0.00	Yes	\$6.62	\$6.62	\$0.00	\$0.00
401k Match	\$0.00	Yes	\$0.00	\$0.00	\$416.67	\$416.67
GTL - Life	\$0.00	No	\$0.00	\$0.00	\$1.25	\$1.25

Taxes

Tax	Based On	Current	YTD
Federal Income Tax	\$9,286.11	\$1,948.01	\$1,948.01
Employee Medicare	\$10,015.28	\$145.22	\$145.22
Social Security Employee Tax	\$10,015.28	\$620.95	\$620.95

Paid Time Off

Net Pay Distribution

Plan	Taken	Current	Balance	Account Number	Account Type	Amount
Floating Hol	0.0000	0.0000	8.0000	xxxxxxxx0223	Checking	\$6,561.78
Personal Time	0.0000	0.0000	24.0000	Total		\$6,561.78
Sick pay	0.0000	4.0000	68.0000			
Vacation	0.0000	0.0000	56.0000			

Pay Summary

	Gross	FIT Taxable Wages	Taxes	Deductions	Net Pay
Current	\$10,416.67	\$9,286.11	\$2,714.18	\$1,140.71	\$6,561.78
YTD	\$10,416.67	\$9,286.11	\$2,714.18	\$1,140.71	\$6,561.78

EXHIBIT C

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

JANE DOE,

CASE NO. CACE-23-002107

Plaintiff,

v.

JAZWARES, LLC

Defendant.

NOTICE OF FILING NOTICE OF REMOVAL

Defendant, Jazwares, LLC (“Defendant”), hereby gives notice, pursuant to 28 U.S.C. § § 1331, 1441, and 1446, of the removal of this action on May 23, 2023 to the United States District Court for the Southern District of Florida, Fort Lauderdale Division. A copy of Defendant’s Notice of Removal is attached as Exhibit “A”. The filing of this Notice of Removal effects the removal of this action to the United States District Court for the Southern District of Florida.

DATED: May 23, 2023.

Respectfully Submitted,

Lewis Brisbois Bisgaard & Smith LLP

110 SE 6th Street, Suite 2600

Ft. Lauderdale, Florida 33301

Telephone: 954-728-1280

Facsimile: 954-728-1282

BY: /s/ Jonathan A. Beckerman

Jonathan A. Beckerman, Esq. (FBN 568252)

E-mail: Jonathan.Beckerman@lewisbrisbois.com

Counsel for Defendant.